

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Angela Blair

Debtor

)
) **Case No: 10 B 00577**
) **Judge: Goldgar**
) **Chapter 13**
)

NOTICE OF MOTION

Served upon the following parties electronically:

Office of United States Trustee, Dirksen Federal Building, 219 S. Dearborn, St., Room 873, Chicago, IL 60604

Trustee: Marilyn O. Marshall, 224 S. Michigan Ave., Ste. 800, Chicago, IL 60604

and served upon the following parties via U.S. Mail:

Debtor: Angela Blair, 5248 Southwick Ct., Matteson, IL 60443

See Attached Service List

PLEASE TAKE NOTICE that on July 1, 2014 at 10:30 a.m.,
or as soon thereafter as I may be heard, I shall appear before the Honorable Judge
Goldgar, or any other Bankruptcy Judge presiding in his place in Courtroom 642 of the
Dirksen Federal Building, 219 S. Dearborn St., Chicago, Illinois, on the attached Motion
to Modify Plan, and shall request that the attached Order be entered, at which time you
may appear if so desired.

PROOF OF SERVICE

I, The undersigned, an attorney, hereby certify that a copy of this notice was served electronically or mailed to the above persons, at her respective addresses, postage prepaid, by depositing in the U.S. Mail at 211 W. Wacker Dr., Chicago, IL 60606, before 6:00 p.m. on or before June 4, 2014.

_____/s/ Michelle Hinds_____

Michelle Hinds
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 200
Chicago, IL 60606
312-273-5001

Label Matrix for local noticing
0752-1
Case 10-00577
Northern District of Illinois
Chicago
Wed Jun 4 14:37:00 CDT 2014

B-Line, LLC
P.O. Box 91121
Dept. 550
SEATTLE, WA 98111-9221

BAC Home Loans Servicing, L.P. fka Countrywide
2270 Lakeside Blvd.
Third Floor
Richardson, TX 75082-4304

BANK OF AMERICA, N.A.
2380 Performance Dr.
Richardson, TX 75082-4333

CR Evergreen, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

East Bay Funding, LLC
c/o Resurgent Capital Services
PO Box 288
GREENVILLE, SC 29602-0288

Vanda, LLC
c/o Weinstein & Riley, P.S.
2001 Western Ave., Ste. 400
Seattle, WA 98121-3132

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

CitiCorp Trust Bank
P.O. Box 140489
Irving, TX 75014-0489

Affiliated Radiologists SC
Dept 4104
Carol Stream, IL 60122-0001

Angela M Blair
5248 Southwick Ct
Matteson, IL 60443-2283

BAC Home Loans Servicing, L.P.
c/o Pierce & Associates, P.C.
One North Dearborn, Suite #1300
Chicago, IL 60602-4321

Bank Of America
Po Box 17054
Wilmington, DE 19850-7054

Barclays Bank Delaware
Attention: Customer Support Department
Po Box 8833
Wilmington, DE 19899-8833

CANDICA L.L.C.
C O WEINSTEIN AND RILEY, PS
2001 WESTERN AVENUE, STE 400
SEATTLE, WA 98121-3132

(p)CAPITAL ONE
PO BOX 30285
SALT LAKE CITY UT 84130-0285

Chase
225 Chastain Meadows Ct., Nw
Kennesaw, GA 30144-5897

Chase Bank USA, N.A.
by PRA Receivables Management, LLC
PO Box 12907
Norfolk VA 23541-0907

Chase Manhattan
Attn: Bankruptcy Research Dept
3415 Vision Dr
Columbus, OH 43219-6009

Citi
Po Box 6241
Sioux Falls, SD 57117-6241

Citi Flex
Po Box 6241
Sioux Falls, SD 57117-6241

Citifinancial Retail Services
Po Box 140489
Irving, TX 75014-0489

City of Chicago
Dept of Revenue
PO Box 88292
Chicago, IL 60680-1292

City of Chicago Department of Revenue c/o
Arnold Scott Harris PC.
222 Merchandise Mart Plaza #1932
Chicago, IL 60654-1420

Countrywide Home Lending
Attention: Bankruptcy SV-314B
Po Box 5170
Simi Valley, CA 93062-5170

David Samson
Legal Helpers, PC
Sears Tower
233 S. Wacker Suite 5150
Chicago, IL 60606-6371

Department of Treasury-Internal Revenue Serv
PO Box 7346
Philadelphia, PA 19101-7346

Empire/gemb
Po Box 981439
El Paso, TX 79998-1439

FIA Card Services aka Bank of America
POB 3001
Malvern, PA 19355-0701

Fia Card Services, NA As Successor In Interest
Bank of America NA and Mbn America Bank
1000 Samoset Drive
DE5-023-03-03
Newark, DE 19713-6000

Illinois Student Assistance Commission
1755 Lake Cook Road
Deerfield IL 60015-5209

JPMorgan Chase Bank, N.A.
201 N. Central Ave.
AZ1-1191
Phoenix, AZ 85004-0073

PRA Receivables Management, LLC
As Agent Of Portfolio Recovery Assocs.
c/o Citibank
POB 41067
NORFOLK, VA 23541-1067

Rush University Medical Center
75 Remittance Dr
Dept 1620
Chicago, IL 60675-1620

Sallie Mae
1002 Arthur Dr
Lynn Haven, FL 32444-1683

eCAST Settlement Corporation
POB 29262
New York, NY 10087-9262

eCAST Settlement Corporation, assignee
of Chase Bank USA, N.A.
POB 29262
New York, NY 10087-9262

Andrew K. Weiss
The Garden City Group, Inc.
190 S. LaSalle St.
Suite 1925
Chicago, IL 60603-3479

David M. Samson
The Law Offices of Ernesto D. Borges, Jr
105 W Madison 23rd Floor
Chicago, IL 60602-4647

Marilyn O Marshall
224 South Michigan Ste 800
Chicago, IL 60604-2503

Michelle K Hinds
Law Office of Jason Blust, LLC
211 W. Wacker Drive
Ste. 200
Chicago, IL 60606-1392

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Capital 1 Bank
Attn: C/O TSYS Debt Management
Po Box 5155
Norcross, GA 30091

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)B-Line, LLC
P.O. Box 91121
Dept. 550
Seattle, WA 98111-9221

(d)CR Evergreen, LLC
MS 550
PO Box 91121
Seattle, WA 98111-9221

(d)East Bay Funding, LLC
c/o Resurgent Capital Services
PO Box 288
Greenville, SC 29602-0288

(d)Vanda, LLC
c/o Weinstein & Riley, P.S.
2001 Western Ave., Ste. 400
Seattle, WA 98121-3132

(d)Angela M Blair
5248 Southwick Ct
Matteson, IL 60443-2283

End of Label Matrix
Mailable recipients 41
Bypassed recipients 5
Total 46

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: Angela Blair

Debtor

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**Case No: 10 B 00577
Judge: Goldgar
Chapter 13**

MOTION TO MODIFY PLAN

Now comes Angela Blair (hereinafter referred to as “DEBTOR”), by and through her attorneys, and moves this Honorable Court for entry of an Order Modifying Plan, pursuant to section 1329 of the bankruptcy code, and in support thereof, respectfully represents as follows:

1. On January 8, 2011, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on March 16, 2010. The confirmed plan provided for payments of \$1,500.00 per month for 60 months, paying unsecured creditors 34% on their timely filed or allowed claims.
3. The Debtor has fallen behind on plan payments because she had to pay for auto repair expenses in excess of \$1,100.00.
4. In addition to the auto repair expenses, the Debtor’s mother passed away, and she had to pay for funeral and burial expenses of approximately \$2,000.00.
5. The Debtor believes she can resume on-time plan payments if their current default is deferred.
6. After deferring the Debtor’s default, the unsecured creditors will still receive 34% on their claims, and the plan will complete in the required 60 months.

WHEREFORE, DEBTOR prays that this Honorable Court enter an Order deferring her current plan payment default, and for such other relief as this Court deems proper under the circumstances.

Respectfully submitted,

 /s/ Michelle K. Hinds
Michelle K. Hinds
Law Office of Jason Blust, LLC
211 W. Wacker Dr., Ste. 200
Chicago, IL 60606
312-273-5001